

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ELIZABETH MARTIN

PLAINTIFF

V.

CIVIL ACTION NO. 3:20-cv-00460-CWR-LRA

PATRICIA MARSHALL

DEFENDANT

PLAINTIFF'S REBUTTAL TO DEFENDANT'S OBJECTION TO PLAINTIFF'S REQUEST
FOR EXTENSION OF TIME

Plaintiff, Elizabeth Martin, files this her Rebuttal to Defendant's Objection to Plaintiff's Request for Extension of Time and in support thereof would show unto the Court the following:

1. Defendant filed her Motion for Summary Judgment on November 4, 2021, [Doc. No. 57].

2. Plaintiff's Response to Defendant's Motion for Summary Judgment was due Thursday, November 18, 2021.

3. Plaintiff had scheduling conflicts on and before November 18, 2021, making an extension necessary and for good cause.

4. Plaintiff's attorney had numerous doctors' appointments during this time, on November 10, November 17, and November 18.

5. Plaintiff's attorney also had a deposition in Cullman, Alabama on November 19, and was out of the office all day and through the weekend.

6. Due to Plaintiff's counsel's scheduling conflicts, Plaintiff requested an additional eleven (11) days (because of the upcoming Thanksgiving holiday) from November 18, 2021, in which to file her Response to Defendant's Motion for Summary Judgment for this good cause shown.

7. Plaintiff's counsel's office contacted the Defendant's attorney, Christian Medina, to inquire if the Defendant had an objection to the extension of time and Mr. Medina did not respond to Plaintiff's counsel's request, but instead filed an Objection to Plaintiff's Request for Time.

WHEREFORE, PREMISES CONSIDERED, Plaintiff moves the Court for an Order an granting her an additional eleven (11) days from November 18, 2021, in which to file her Response to Defendant's Motion for Summary Judgment for this good cause shown.

Respectfully submitted, this the 23rd day of November, 2021.

ELIZABETH MARTIN

/s/ Wayne E. Ferrell, Jr.
WAYNE E. FERRELL, JR.

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CERTIFICATE OF SERVICE

I, WAYNE E. FERRELL, JR., do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court utilizing the ECF system which sent notification of such filing to all counsel of record.

This the 23rd day of November, 2021.

By: /s/ Wayne E. Ferrell, Jr.
WAYNE E. FERRELL, JR.